

AMENDED WITNESS AND EXHIBIT LIST

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| UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION | |
| Case No: 18-32106 (Jointly Administered) | Name of Debtors: Erin Energy Corporation, et al.,¹ |
| Witnesses: 1. Sakiru Adefemi (Femi) Ayoade 2. Diplo Bello 3. Loretta Cross 4. Greg Holcombe 5. Any witness listed by other parties | Judge: Marvin Isgur |
| | Hearing Date: June 19, 2018 |
| | Hearing Time: 9:00 a.m. |
| | Party Names: Erin Energy Corporation, et al. |
| | Attorney's Name: Matthew S. Okin |
| | Attorney's Phone: (713) 228-4100 |
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Nature of Proceedings:

1. Emergency Motion of Armada Oyo Limited and Bumi Armada (Singapore), Pte., Ltd. and for an Order Pursuant to Sections 105(a), 362(d)(1) and 363(e) of the Bankruptcy Code Modifying the Automatic Stay and Granting Related Relief [Doc. #69]
2. Emergency Motion of Armada Oyo Limited and Bumi Armada (Singapore) Pte., Ltd. to Compel Assumption or Rejection of Executory Contracts Pursuant to Sections 105(a) and 365(d)(2) of the Bankruptcy Code [Doc. #71]
3. Debtors' Application for an Order Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code Authorizing the Employment and Retention of Okin Adams LLP as Counsel for the Debtors [Doc. No. 91]
4. Debtors' Application for an Order Pursuant to Section 327(a) of the Bankruptcy Code Authorizing the Employment and Retention of Stout Risius Ross, LLC as Financial Advisor to the Debtors [Doc. No. 93]
5. Debtors' Emergency Motion for the Entry of an Order Pursuant to Sections 105(a) and 362 of the Bankruptcy Code Holding Zenith Bank PLC in Contempt for Violating the Automatic Stay [Doc. No. 178]

¹ The last four digits of Erin Energy Corporation's ("ERN") federal tax identification number are 9798. The other Debtors in these cases are: Erin Energy Limited ("EEL"); Erin Energy Kenya Limited ("EEKL"); and Erin Petroleum Nigeria Limited ("EPNL"). The Debtors' service address is: 1330 Post Oak Blvd., Suite 2250, Houston, TX 77056.

6. Debtors' Expedited Motion for Entry of an Order Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business [Doc. No. 196].
7. Emergency Motion for Pursuant to 11 U.S.C. §§ 105, 361, and 364 and Federal Bankruptcy Rules 2002, 4001, and 9004 for a Final Order Authorizing the Debtors to Incur Post-Petition Secured Indebtedness [Doc. No. 203]

DEBTOR'S EXHIBITS

| Ex.# | Description | Offered | Objection | Admitted/ Not Admitted | Disposition |
|------|--|---------|-----------|------------------------------|-------------|
| 1. | Map of Debtors' Oil and Gas Operations in Africa | | | | |
| 2. | Diagram of Debtors' Corporate Structure | | | | |
| 3. | Declaration of Matthew S. Okin in Support of the Debtors' Application for Order Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code Authorizing Employment and Retention of Okin Adams LLP as Counsel for the Debtors and Statement Pursuant to Bankruptcy Rule 2016(b) [Doc. #91-1] | | | | |
| 4. | Affidavit of Proposed Financial Advisor and Disclosure of Compensation [Doc. #93-1] | | | | |
| 5. | Proposed Ordinary Course Professional Procedures | | | | |
| 6. | Form of Declaration of Disinterestedness for OCPs | | | | |
| 7. | Schedule of Ordinary Course Professionals [Doc. #196-2] | | | | |
| 8. | Corporate Guarantee by Camac Energy Inc. Made in Favour of Zenith Bank PLC dated September 11, 2014 [Doc. #178-1] | | | | |

| Ex.# | Description | Offered | Objection | Admitted/ Not Admitted | Disposition |
|-------------|--|----------------|------------------|---------------------------------------|--------------------|
| 9. | Letter dated February 23, 2017 regarding the resignation of Mr. Segun Omidele from the Erin Board of Directors [Doc. #178-2] | | | | |
| 10. | Wire transfer notification dated January 9, 2018 in the amount of \$3,200,000 [Doc. #178-3] | | | | |
| 11. | Bank of America Account Statement showing January 9, 2018 deposits [Doc. #178-4] | | | | |
| 12. | May 22, 2018 Letter from J.K. Randle to Erin Petroleum regarding Notice of Appointment of Receiver [Doc. #178-5] | | | | |
| 13. | May 31, 2018 Letter from Terra Marine Attorneys to J.K. Randle regarding Notice of Appointment of Receiver [Doc. #178-6] | | | | |
| 14. | Zenith Bank List of Correspondent Banks and International Banking Partners [Doc. #178-7] | | | | |
| 15. | Corporate Guarantee by Erin Energy Corporation Made in Favour of Zenith Bank PLC dated August 3, 2016 [Doc. #178-8] | | | | |
| 16. | Letter to United States Bankruptcy Court from Charles Nwabulu of Kenna Partners dated June 7, 2018 [Doc. #187] | | | | |
| 17. | Receivership papers from Zenith Bank [Doc. #187-1] | | | | |
| 18. | Zenith Bank PLC Motion to Set Aside Order entered on May 25, 2018 [Doc. #187-2] | | | | |

| Ex.# | Description | Offered | Objection | Admitted/ Not Admitted | Disposition |
|-------------|--|----------------|------------------|---------------------------------------|--------------------|
| 19. | Sworn Affidavit of Facts of Mr. Bosah Okonyia [Doc. #187-3] | | | | |
| 20. | Motion on Notice in the Federal High Court in the Lagos Judicial Division filed by the Ministry of Petroleum Resources and Department of Petroleum Resources | | | | |
| 21. | Proposed Budget [Doc. #203-1] | | | | |
| 22. | Proposed DIP Loan Order [Doc. #203-2] | | | | |
| 23. | Proposed DIP Loan Note | | | | |
| 24. | Any Exhibit Designated by Any Other Party | | | | |
| 25. | Rebuttal Exhibits | | | | |

Respectfully submitted this 18th day of June, 2018.

Respectfully submitted,

OKIN ADAMS LLP

By: /s/ Matthew S. Okin

Matthew S. Okin

Texas Bar No. 00784695

David L. Curry, Jr.

Texas Bar No. 24065107

dcurry@okinadams.com

John Thomas Oldham

Texas Bar No. 24075429

joldham@okinadams.com

Ryan A. O'Connor

Texas Bar No. 24098190

roconnor@okinadams.com

1113 Vine St., Suite 201

Houston, Texas 77002

Tel: 713.228.4100

Fax: 888.865.2118

**PROPOSED ATTORNEYS FOR THE
DEBTORS**

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2018, I filed the foregoing pleading electronically, causing a true and correct copy of the foregoing to be served via the Court's EM/ECF electronic system to all parties consenting to service through same.

/s/ Matthew S. Okin

Matthew S. Okin